

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division

CHRISTINE GIBBONS,

Plaintiff,

v.

Case No. 6:23cv00035

BETTY ANN GIBBS, IN HER OFFICIAL
CAPACITY AS SECRETARY OF THE
LYNCHBURG ELECTORAL BOARD, AND
IN HER PERSONAL CAPACITY; STEVEN
TROXEL, IN HIS OFFICIAL CAPACITY AS
VICE CHAIR OF THE LYNCHBURG
ELECTORAL BOARD, AND IN HIS
PERSONAL CAPACITY; AND THE
ELECTORAL BOARD OF THE CITY OF
LYNCHBURG,

Defendants.

MOTION TO STAY

Defendants Betty Ann Gibbs, in her personal capacity, and Steven Troxel, in his personal capacity (collectively, “Defendants”), hereby request that this Court rule on the Motion for Judgment on the Pleadings and then stay all proceedings pending the conclusion of the Defendants’ interlocutory appeal.

WHEREFORE, for the foregoing reasons and the reasons set forth in Defendant’s Brief in Support, which is incorporated as though fully set forth herein, Defendants ask that this Motion be granted.

**BETTY ANN GIBBS, IN HER
PERSONAL CAPACITY; STEVEN
TROXEL, IN HIS PERSONAL
CAPACITY**

By Counsel

/s/ David P. Corrigan
David P. Corrigan (VSB No. 26341)
M. Scott Fisher, Jr. (VSB No. 78485)
Counsel for Defendants
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com
sfisher@hccw.com

CERTIFICATE

I hereby certify that on the 28th day of August, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Stephen B. Pershing (VSB No. 31012)
Kalijarvi, Chuzi, Newman & Fitch, P.C.
818 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20006
202-331-9260 - Phone
spershing@kcnlaw.com

/s/ David P. Corrigan

David P. Corrigan (VSB No. 26341)

M. Scott Fisher, Jr. (VSB No. 78485)

Counsel for Defendants

Harman, Claytor, Corrigan & Wellman

P.O. Box 70280

Richmond, Virginia 23255

804-747-5200 - Phone

804-747-6085 - Fax

dcorrigan@hccw.com

sfisher@hccw.com